

**GUIDELINES FOR PREPARING A
CONSOLIDATED PLAN SUBMISSION
FOR LOCAL JURISDICTIONS
U.S. Department of Housing and Urban Development
Office of Community Planning and Development**

INTRODUCTION

The Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for community development actions. It offers local jurisdictions the opportunity to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level.

The strategic plan is a specific course of action for revitalization. It is the means to analyze the full local context and the linkages to the larger region. It builds on local assets and coordinates a response to the needs of the community. It integrates economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive. A strategic plan also sets forth program goals, specific objectives, annual goals, and benchmarks for measuring progress. In so doing, it helps local governments and citizens keep track of results and learn what works.

The Consolidated Plan approach is also the means to meet the application requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) formula programs. This process replaces prior CPD planning and application requirements with a single document, and satisfies the submission requirements of the four CPD formula programs for local jurisdictions.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each jurisdiction's plan must state how it will pursue these goals for all community development programs, as well as all housing programs. These statutory program goals are:

DECENT HOUSING - - which includes:

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retention of affordable housing stock;
- increase the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to

- live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

A SUITABLE LIVING ENVIRONMENT - - which includes:

- improving the safety and livability of neighborhoods;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conservation of energy resources.

EXPANDED ECONOMIC OPPORTUNITIES - - which includes:

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- the provision of public services concerned with employment;
- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

At each jurisdiction's discretion, the information can be displayed in any clear, concise format and should include an executive summary that communicates the key elements of the plan to citizens. These elements include the needs assessment, priority needs, specific objectives, and how the activities will address identified needs and objectives. All required elements of the plan (including tables and narratives) should be submitted to HUD in an electronic format. Electronic data assists HUD and its program partners to exchange information more easily and better serves the families and communities that HUD programs are designed to serve.

Public reporting burden for this collection is estimated to average 395 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number. This collection of information is required by 24 CFR Part 91 which requires a jurisdiction administering CPD programs to submit Consolidated Plans and Performance Reports on progress it has made in carrying out its strategic plan and action plan. OMB Approval No. 2506-0117 (exp. 8/31/2005)

PREPARING A CONSOLIDATED PLAN SUBMISSION

These steps guide the jurisdiction through the process of preparing its consolidated plan submission to HUD.

I. Managing the Process

The consolidated plan submission process envisions that housing and community development planning and programming will be accomplished through a unified and comprehensive framework that opens new opportunities for collaboration and collective problem-solving. Partnerships among government agencies and between government and private groups are developed in order to marshal government and private resources to achieve intended public purposes. These steps require jurisdictions to take and/or describe specific actions and initiatives relevant to the preparation of the consolidated plan.

Presubmission requirements:

Required Consultation - Jurisdictions must consult and coordinate with appropriate public and private agencies, such as the State and other local jurisdictions; public and private agencies that provide assisted housing, health services, and social services agencies including services to children, elderly persons, homeless persons, persons with disabilities (including persons with HIV/AIDS and their families); and other categories of residents, and among its own departments, to assure that its consolidated plan is a comprehensive document and addresses statutory purposes.

Lead - Based Paint - The jurisdiction must consult with state and local health and child welfare agencies, and examine data on hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

Submission Requirements:

Lead Agency - The jurisdiction must identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.

Consultation/Coordination - The jurisdiction must identify the significant aspects of the process by which the plan was developed, the agencies, groups, organizations, and others who participated in the process. It must describe the jurisdiction's consultation with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons, as well as activities it will undertake to enhance coordination between public and assisted housing providers, and among private and governmental health, mental health, and service agencies. HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must

assist in the preparation of the HOPWA submission.

Institutional Structure - The jurisdiction must explain the institutional structure through which it will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions. The jurisdiction must also assess the strengths and gaps in the delivery system. For public housing this must include a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

Guidance:

Collaboration and Partnership - In organizing to prepare the consolidated plan submission, has the jurisdiction considered establishing new relationships and organizational structures among various agencies and organizations in order to maximize the benefits that should arise from the collective problem solving and coordinated activities? Does the lead agency that coordinates the consolidated planning and submission process have adequate authority and ability to accomplish the following:

- Develop interagency agreements and coordinating bodies that can facilitate cooperation among the jurisdiction's line agencies?
- Work with other jurisdictions and organizations that have a regional responsibility for economic development, business, employment, and planning?
- Provide continuity of management for the process over time and the confidence of citizen organizations that citizens participating in the process have meaningful access to the decision making process?

Leadership -- The consolidated plan should have the clear backing and support of the Mayor or Chief Elected Official. Real cooperation and coordination will not occur without leadership by the jurisdiction's elected officials and citizens will not participate in a process that does not have leadership by elected officials. Leadership also aids in the effective implementation of the plan and increases commitment to the plan.

Citizen Participation

The consolidated plan must result from an effective citizen participation process. Existing, ongoing citizen participation activities may be used when they are strong and vital. Jurisdictions have the flexibility to choose the participation process that best works for the low income citizens who are the primary clients for HUD programs.

The jurisdiction must develop and follow a detailed citizen participation plan that addresses each of the following elements. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to review and comment on the original citizen participation plan, on substantial amendments to the citizen participation plan, and must make the citizen participation plan public.

Participation -- The citizen participation plan must provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. These requirements are designed especially to encourage participation of low- and moderate- income residents where housing and community development funds may be spent. The jurisdiction is expected to take whatever actions are appropriate to encourage the participation of all its residents, including minorities and non-English speaking persons, as well as persons with disabilities in all stages of the process.

The jurisdiction shall encourage the participation of residents of public and assisted housing developments and recipients of tenant-based assistance in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The jurisdiction shall make an effort to provide information to the housing agency about consolidated plan activities related to its developments and surrounding communities that the housing agency can make available at the annual public hearing required for the Public Housing Agency Plan.

Access to Information -- Citizens, public agencies, and other interested parties, including those most affected, must have the opportunity to receive information, review and submit comments on any proposed submission concerning the proposed activities, including the amount of assistance the jurisdiction expects to receive (including grant funds and program income), and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

Anti-displacement -- The citizen participation plan must set forth the jurisdiction's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the jurisdiction expects no displacement to occur.

Publishing the Plan - The jurisdiction must publish its proposed consolidated plan submission so that affected citizens have sufficient opportunity to review it and provide comments. The requirement for publishing may be met by publishing a summary of the proposed consolidated plan in one or more newspapers of general circulation and making copies of the proposed plan available at libraries, government offices, and public places. The summary must describe the contents and purpose of the consolidated plan, and must include a list of the locations where copies of the entire plan may be examined. The jurisdiction must also provide a reasonable number of free copies of the plan to citizens

and groups that request it.

Public Hearings -- The jurisdiction must provide at least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, and review of program performance.

In order to obtain the views of citizens on housing and community development needs, including priority nonhousing community development needs, the citizen participation plan must provide that at least one of these hearings is held before the proposed consolidated plan is published for comment.

The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The citizen participation plan must specify how it will meet these requirements.

The citizen participation plan must identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

Notice of Hearings -- The citizen participation plan must state how and when adequate advance notice will be given to citizens of each hearing (including residents of assisted and public housing) and sufficient information must be published about the subject of the hearing. (Although HUD is not specifying the length of notice required, two weeks is considered adequate. However, publishing small print notices in the newspaper a few days before the hearings does not constitute adequate notice.)

Access to Meetings -- The citizen participation plan must provide citizens with reasonable and timely access to local meetings.

Comments -- The citizen participation plan must provide a period of not less than 30 days, prior to the submission of the consolidated plan, to receive comments from citizens. The jurisdiction must consider the views of citizens, public agencies and other interested parties in preparing its final consolidated submission.

Substantial Amendments -- The citizen participation plan must specify the criteria the jurisdiction will use for determining what changes in the jurisdiction's planned or actual activities constitute a substantial amendment to the consolidated plan. It must include among the criteria for a substantial amendment changes in the use of CDBG funds from one eligible activity to another. The citizen participation plan must provide at least 30 days to receive comments on a substantial amendment before the amendment is implemented. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings, if any, in

preparing the substantial amendment. A summary of these comment and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the substantial amendment.

Performance Reports -- The citizen participation plan must provide citizens with reasonable notice and an opportunity too comment on performance reports. The citizen participation plan must state how reasonable notice and an opportunity to comment will be given. The citizen participation plan must provide at least 15 days to receive comments on the performance report that is to be submitted to HUD before its submission. The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments shall be attached to the performance report.

Availability to the Public -- The citizen participation plan must provide that the consolidated plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The citizen participation plan must state how these documents will be available to the public.

Access to Records -- The citizen participation plan must require the jurisdiction to provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan and the jurisdiction's use of assistance under the programs covered by the plan during the preceding five years.

Technical Assistance -- The citizen participation plan must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the consolidated plan.

Complaints -- The jurisdiction must describe appropriate and practicable procedures to handle complaints from citizens related to the consolidated plan, amendments, and performance report. At a minimum, the citizen participation plan shall require the jurisdiction to provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 days, where practicable, if the jurisdiction is a CDBG grant recipient).

Amendments -- Prior to the submission of any substantial change in the proposed use of funds, citizens must have reasonable notice of, and opportunity to comment on, the proposed amendment.

Submission Requirements:

Citizen Participation -- The jurisdiction must include a summary of the citizen

participation process, a summary of citizen comments or views on the plan, and efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities. The summary of citizen comments must include a written explanation of comments not accepted and the reasons why these comments were not accepted.

Guidance:

The plan should include or provide:

Executive Summary -- a clear, concise executive summary that communicates the key elements of the plan to citizens. These elements include the priority needs, specific objectives, annual goals and how the activities will address identified needs and objectives.

Public Notices -- for citizen participation through one or more of the following: publication of notices and information in nonlegal sections of major newspapers; in neighborhood, minority, and non-English newspapers; through public service announcements over radio and television; by direct mailings and phone contacts to organizations that have requested it. Notices should be published 14 calendar days prior to a public hearing or a deadline.

Public Hearings --hold hearings and meetings at times and places that are convenient and comfortable for people most affected by the proposal. Hearings or informational meetings should be held on weekends or in the evening preferably near neighborhoods that are targeted for assistance.

Technical Assistance -- consider providing technical assistance for proposals that strengthen and expand the role of community based development organizations in planning retail, commercial, affordable housing and other public improvements.

II. Strategic Plan

The jurisdiction must produce a strategic plan for a period designated by the jurisdiction that brings needs, priority needs, priorities, specific objectives, and strategies together in a coherent strategic plan. In identifying and describing its needs, the jurisdiction is encouraged to draw relevant information from previous submissions and other reports and studies, as appropriate. The strategic plan must be developed to achieve the following statutory goals, principally for extremely low-, low- and moderate-income residents:

- provide decent housing and
- a suitable living environment and
- expand economic opportunities.

Submission Requirements:

Time Period -- The jurisdiction must state the period of time covered by the plan.

Priority Needs Analysis and Strategies -- The jurisdiction must indicate the priority needs in accordance with the priority needs tables prescribed by HUD, describe the basis for assigning the priority given to each category of priority needs, and identify any obstacles to meeting underserved needs. In addition, the jurisdiction must describe the general priorities for allocating investment geographically within the jurisdiction (or within the EMSA for the HOPWA program) and among priority needs. The rationale for establishing relative priority needs should flow logically from this analysis.

Specific Objectives -- The jurisdiction's strategic plan must summarize priorities and specific objectives it intends to initiate and/or complete in accordance with the priority needs tables prescribed by HUD. Specific objectives should describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

The jurisdiction must address the following concerns, preferably through a coordinated strategy:

Submission Requirements:

HOMELESS

Homeless Needs - The jurisdiction must describe the nature and extent of homelessness, (including rural homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The description must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but threatened with homelessness.

The jurisdiction shall also describe existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A which include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The plan must also include a narrative description of the nature and extent of homelessness by racial and ethnic group, to the extent information is available.

Priority Homeless Needs -- Using the results of the comprehensive homeless planning process, identify the jurisdiction's priority homeless needs specified in Table 1A. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category.

Homeless Strategy -- Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes outreach/assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income individuals and families) from becoming homeless.

SPECIAL NEEDS POPULATIONS

Special Needs Populations -- The jurisdiction must estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, and any other categories the jurisdiction may specify and describe their supportive housing needs. In addition, HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

The jurisdiction can use Table 1B of their Consolidated Plan to help identify these needs. The plan must also describe, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

Priority Needs of Special Needs Populations -- Identify the priority housing and supportive service needs of persons who are not homeless but require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using Table 1B.

Specific Objectives -- Identify specific objectives developed in accordance with the

statutory goals described in section 24 CFR 91.1 that the jurisdiction intends to initiate and/or complete in accordance with the priority needs tables prescribed by HUD. Specific objectives should describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

HOUSING

Housing Needs - The jurisdiction must provide an estimate of housing needs projected for the next five year period. This includes an estimate of the number and type of families in need of housing assistance for extremely low-income, low-income, moderate-income, and middle-income families, for renters and owners; and the specification of such needs for different categories of persons, including elderly persons, single persons, large families, public housing residents, families on the public housing and section 8 tenant-based waiting list, persons with HIV/AIDS and their families, and persons with disabilities; and a discussion of specific housing problems, including cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families) compared to the jurisdiction as a whole.

Housing data included in this portion of the plan shall be based on U.S. Census data as provided by HUD and updated by any properly conducted local study, or any other reliable source that the jurisdiction clearly identifies. Jurisdictions may wish to refer to Table 1C from the FY94 CHAS in preparing their narrative. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

Priority Housing Needs -- The jurisdiction must identify the priority housing needs in accordance with the categories specified in Table 2A. These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan. The jurisdiction must provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category. Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

Market Analysis - Based on information available to the jurisdiction the consolidated plan must describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. The jurisdiction shall include a description of its number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

Specific Housing Objectives -- Each specific housing objective must be identified by number, contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction. Specific housing objectives must describe how funds that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan and separately indicate the number of extremely low-income, low-income, and moderate-income families assisted for whom it will provide affordable rental and homeownership housing with Federal funds over a specific time period according to the standards in section 215 of Title II of the National Affordable Housing Act of 1990, as amended.

The housing strategy must indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

Needs of Public Housing – In cooperation with the public housing agency or agencies located within its boundaries, the plan must describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i. e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use optional Table 4 of the Consolidated Plan to identify priority public housing needs to assist in this process.

Public Housing Strategy-- Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-

income, low-income, and moderate families residing in public housing. The jurisdiction must also describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation.

Lead-Based Paint Needs -- The jurisdiction must estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.

Barriers to Affordable Housing -- This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

Fair Housing -- The jurisdictions were required to complete an analysis of impediments to fair housing choice within one year of the effective date of the consolidated plan rule (February 6, 1995). The analysis was not required to be submitted as part of the consolidated plan, but the jurisdiction must certify that it completed the analysis, is taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintains records reflecting the analysis and actions in this regard.

Anti-Poverty Strategy -- describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible. In addition, the jurisdiction must identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

Monitoring – describe the standards and procedures it will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

COMMUNITY DEVELOPMENT

Priority Non-housing Community Development Needs -- Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in Table 2B, (i.e., public facilities, public improvements, public services and economic development).

Community Development Objectives -- Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Guidance:

Strategic Vision for Change -- If the jurisdiction is developing a long-term program for significant change in its community, has it engaged in a process that will develop a comprehensive vision of its desired future? How does the vision make the community and its target neighborhoods more livable, better functioning, and more attractive? Does it integrate economic, physical, environmental, community, and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive?

Neighborhood Revitalization Strategy Areas -- A jurisdiction that elects to develop a neighborhood revitalization strategy that includes the economic empowerment of low- and moderate-income persons may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). For details see Attachment.

Public Housing -- Has the jurisdiction provided examples of supportive efforts to revitalize neighborhoods surrounding public housing projects (either current or proposed); cooperation in the provision of resident programs and services; coordination

of local drug elimination or anti-crime strategies; upgrading of police, fire, schools, and other services; and economic development projects in or near public housing projects that expand economic opportunity or tie in with self-sufficiency efforts for residents.

Mapping Data -- Has the jurisdiction mapped the data to identify the geographic areas in which concentrations of various housing needs, community development needs and homeless needs and facilities overlap? Similarly, has the jurisdiction mapped the location of essential human services, recreational activities and other amenities to help illustrate whether existing services and facilities are convenient and accessible to various populations?

Metropolitan/Regional Connections -- Clear connections should be established between communities, neighborhoods, and the larger metropolitan region. Does the jurisdiction's strategic plan connect its actions to the larger economic strategies for the metropolitan region? Does the plan make connections with agencies that have responsibilities for metropolitan economic development, transportation, and workforce investment?

Needs of Special Populations -- Does the strategy include efforts to provide housing or supportive services for persons with special needs, such as the elderly, frail elderly, persons with severe mental illness, the developmentally disabled, physically disabled, persons with alcohol or other drug addiction, or persons with AIDS and their families?

Identifying Benchmarks -- Benchmarks establish specific targets on the road to achieving goals and carrying out strategies. They are essential for purposes of accountability and measuring success. A benchmark charts the progress from the baseline of the present condition to the achievement of the goal. For example, benchmarks should include timetables and numerical targets for supporting economic development and developing housing, infrastructure, social services, and other necessary improvements.

III. Consolidated Action Plan

In this section, the jurisdiction must describe the actions, projects, and programs that will take place during the next year to address the priority needs and specific objectives identified by the strategic plan. The action plan, that is submitted annually, must identify the linkage between the use of federal resources and the specific objectives developed to address priority needs identified in the strategic plan. This can be demonstrated by listing the project numbers that support each specific objective, or by listing the specific objective the project supports. The grantees are required to identify all programs and identify all resources during that particular program year. Table 3 contains tabular format for listing the projects that will take place during the program year.

Submission Requirements:

Action Plan Elements

A. Sources of Funds -- Identify the resources from private and public sources. The plan must describe those amounts allocated under HUD formula grant programs, program income the jurisdiction expects to receive during the program year, and proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan. The jurisdiction must explain how federal funds will leverage resources from private and non-federal public sources, and a description of how matching requirements of HUD programs will be satisfied. Where the jurisdiction deems it appropriate, it may indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.

B. Statement of Specific Annual Objectives -- The jurisdiction's action plan must contain a summary of the priorities and specific annual objectives to be addressed during the next program year. The plan must describe how the formula grant funds and program income the jurisdiction expects to receive during the program year will be used to address identified needs during the forthcoming program year. Each specific objective developed to address a priority need must be identified by number, contain proposed accomplishments and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms during the time period, or in other measurable terms as identified and defined by the jurisdiction.

C. Description of Projects -- The action plan must describe the eligible programs or projects that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan. The description of projects shall estimate the number and type of families (including income level) that will benefit from the proposed use of funds, and identify the specific local objectives and priority needs that will be addressed. The action plan must also indicate the number and type of proposed accomplishments the jurisdiction hopes to achieve and a target date for completion of the project. This information must be presented in accordance with the instructions for Table 3.

D. Geographic Distribution -- The action plan must describe the geographic areas of the jurisdiction (including areas of minority concentration) in which it will direct assistance during the program year.

E. Homeless and Other Special Populations -- The jurisdiction must describe its projects to address emergency shelter and transitional housing needs of homeless individuals and homeless families with children (including the subpopulations), to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless, to help homeless persons make the transition to permanent housing and independent living, and to address the special needs of persons who are not homeless but require supportive services, such as persons with disabilities and persons living with HIV/AIDS and their families (required for HOPWA recipients).

F. Needs of Public Housing -- The jurisdiction must describe the manner in which the plan of the jurisdiction will address the needs of public housing during the program year. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance to improve the operations of the public housing agency to remove such designation.

G. Anti-Poverty Strategy -- describe the actions it plans to take during the next year to reduce the number of poverty level families (as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.

H. Lead-Based Paint Hazards - - describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families.

I. Other Actions -- The jurisdiction must describe actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, remove barriers to affordable housing, develop institutional structure, enhance coordination between public and private housing, health, and social service agencies, encourage public housing residents to become more involved in management and participate in homeownership.

J. Monitoring -- The jurisdiction must describe actions that will take place during the next year to monitor its housing and community development projects and to ensure long-term compliance with program requirements and comprehensive planning requirements. Program requirements include appropriate regulations and statutes of the programs involved, including steps being taken to review affordable housing projects, ensure timeliness of expenditures, on-site inspections it plans to determine compliance with housing codes, and actions to be taken to monitor its subrecipients.

Specific CDBG Submission Requirements:

Sources of Funds -- CDBG resources must include the following in addition to the annual grant:

1. Program income expected to be received during the program year, including:
 - (a) the amount expected to be generated by and deposited to revolving loan funds;
 - (b) the total amount expected to be received from each new float-funded activity included in this plan; and
 - (c) the amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

NOTE: Amounts described in a prior statement or plan are not to be included in the amount programmed for use in the current plan as they were programmed for use in the statement or plan that first included the float-funded activity generating them.

2. Program income received in the preceding program year that has not been included in a statement or plan;
3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.
4. Surplus funds from any urban renewal settlement for community development and housing activities; and
5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

Float-funded activities -- If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:

1. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:
 - (i) amend or delete activities in an amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR
 - (ii) obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR
 - (iii) agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.
2. For each float-funded activity for which program income is included in 1(c) under Sources of Funds above, the jurisdiction must identify the prior statement or plan in which the planned use has already been described.

Locations -- The information about projects in the action plan must be described in sufficient

detail, including geographic location if available, to allow citizens to determine the degree to which they may be affected. If the location of a specific project is not known or is confidential, the jurisdiction should identify the general area or activity. For projects for which the jurisdiction has not yet decided on a specific location, such as when the jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, the description shall identify who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.

Contingency -- A jurisdiction must describe projects planned with respect to all CDBG funds expected to be available during the program year, except that an amount generally not to exceed ten percent of such total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.

Urgent needs -- An "urgent need" activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.

Specific HOME Submission Requirements:

Resale Provisions -- For homeownership activities, the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4).

HOME Tenant-Based Rental Assistance -- The participating jurisdiction must describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

Other Forms of Investment -- If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), the jurisdiction must describe these forms of investment.

Affirmative Marketing -- The participating jurisdiction must describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units. (See 24 CFR 92.351(a)).

Minority/Women's Business Outreach -- The participating jurisdiction must describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment

banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction. (See 24 CFR 92.351.(b))

Refinancing – If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, it must state its financing guidelines required under 24 CFR 92.206(b).

Specific ESG Submission Requirements:

The jurisdiction must describe the process and criteria for awarding its grant funds along with the source and amount of matching funds.

Specific HOPWA Submission Requirements:

A city applicant for an EMSA must describe how the proposed activities will be used to meet the urgent needs of persons with HIV/AIDS and their families that are not being addressed by public and private resources within the metropolitan area, the public and private resources expected to be made available in connection with the proposed activities being funded, and the method of selecting project sponsors for activities in the metropolitan area, including areas not within the boundaries of the applicant city.

Guidance:

Impediments to Fair Housing Choice -- As part of the certification to affirmatively further fair housing, jurisdictions were required to complete an analysis of impediments to fair housing choice and to take actions to overcome the effects of any impediments identified through that analysis. Jurisdictions are strongly encouraged to annually update their analysis of impediments and to include planned actions to overcome the effects of any impediments identified through that analysis in the annual action plan submission.

Identifying Benchmarks – Has the jurisdiction identified the baselines, benchmarks, and goals that should be used in evaluating performance in implementing the plan, and does it contemplate an on-going process for adjustment, corrections, and building on what works?

Coordination – Part of the problem of making the pieces fit into an overall strategy is determining which Federal programs can be usefully integrated into the process of carrying out the plan. Communities are encouraged to find ways to link Federal programs in creative ways. In some cases, the selected strategy may not exactly fit within the confines of existing Federal programs. In these cases, communities are encouraged to identify the programmatic waivers or other regulatory changes that would be required to use the funding.

Priority Needs Summary Tables

General Information:

These tables are to be used to designate the relative priority to be given to each category of needs for the period of time designated in the strategic plan portion of this document.

Table 1A Homeless Population Instructions

Jurisdictions must enter the number of homeless persons in Table 1A with the most reliable data it has meeting the standards described in 1. and 2.

1. The data entered about homeless populations in the first two sections of Table 1A (Homeless Individuals and Homeless Persons in Families with Children) must be reliable and based upon a point-in-time (one-day) measure of homelessness.

All data entered must be calculated in a manner that eliminates duplication.

A jurisdiction must provide a complete description of the sources and methods used to generate the data addressing, where appropriate, the following: (a) when the study was conducted; (b) who did the study; (c) the study's purpose(s); (d) geographical area(s) covered; (e) time period of data collection (e.g., one night, over a week's time); (f) locations included (shelter-type facilities, service facilities, non-facility locations, such as streets, parks); and (g) corrections made for possible duplicate counting.

If the jurisdiction is unsure about whether its counting methods meet HUD's standards, it may contact the local Office of Community Planning and Development.

2. Decennial Census data may not be used as follows:

Street or unsheltered data may not be used.

The jurisdiction may use the "shelter" counts. If the counts are not reliable, the jurisdiction must adjust the data.

First column "Estimated Need":

Beds/units: Enter the estimated number of beds that the community would need to accommodate at one point in time (that is, on a given night) all homeless individuals (upper portion of chart) and homeless persons in families with children (lower portion of chart). When added together, these represent the estimated number of homeless persons in the community at one point in time. Be sure not to double count since a homeless person would occupy only one type of housing on a given night.

Supportive Services Slots: Enter the number of slots that the community would need to provide supportive services, at one point in time, to all homeless individuals and homeless persons in families with children. You may double count since homeless persons may need multiple services. You may revise the chart to show additional supportive services to reflect the needs in your community.

Subpopulations: Enter the estimated number of homeless persons, at one point in time, who are part of the subpopulations listed. You may double count since a homeless person may have multiple characteristics. You may revise the chart to show additional subpopulations to reflect the characteristics of homeless persons in your community.

Second Column “Current Inventory”: Enter the number of existing beds, existing supportive services slots, and homeless persons by subpopulation who are currently being served in the community. This inventory includes resources that are currently available and are currently under development.

Third Column “Unmet Need/Gap”: Enter the number produced by subtracting the “Current Inventory” from the “Estimated Need.”

Fourth Column “Relative Priority”: To show your community’s relative priorities for beds and supportive services slots, enter one of the following letters: H (for High), M (for Medium), L (for Low), or N (for No Such Need) to signify the relative priority to be given to each category of residents during the period of time designated in the strategic plan component of this document.. Realizing that all your needs may be high priority (in an absolute sense), for planning please ensure that your chart has a combination of relatively low, medium, and high priorities.

Table 1B
Special Needs (Non-Homeless) Populations

General Instructions:

To the degree practicable, give your best estimate of the unmet needs of special need populations for each sub-populations of the non-homeless persons during the time designated in the strategic plan. In addition to the listed sub-populations you can add other groups in need.

Priority Need Column: Show the community’s priority need level for each sub-population by entering the letter H (for High), M (for Medium), L (for Low) or N (for No Such Need) to signify the relative priority to be given to each sub-population during the period of time designated in the strategic plan.

Unmet Priority Need: To the degree practicable, jurisdictions should enter the best estimate of the unmet need for supportive housing or services. Data may be calculated from administrative record keeping, enumerations, statistically reliable samples, or other sources.

Estimated \$ Column: To the degree practicable, jurisdictions should enter the estimated dollar amount required to properly address the need.

Goals: Enter the 3-5 year and annual housing goals identifying the non-homeless number of people with special needs the jurisdiction expects to serve during the period of time designated in the strategic plan component of this document.

Line item instructions:

“Elderly”: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of elderly persons that are not homeless but need supportive housing or services.

“Frail Elderly”: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of frail elderly persons that are not homeless but need supportive housing or services.

“Severe mental illness only”: Enter the best estimate of unmet need and the estimated dollar amount required to address the needs of severe mentally ill persons that are not homeless but need supportive housing or services.

“Developmentally disabled”: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of developmentally disabled persons that are not homeless but need supportive housing or services.

“Physically disabled”: Enter the best estimate of unmet need and estimated dollar amount of required to address the needs of physically disabled persons that are not homeless but need supportive housing or services.

“Alcohol/other drug addiction only”: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with alcohol/other drug addiction that are not homeless but need supportive housing or services.

“HIV/AIDS”: Enter the best estimate of unmet need and estimated dollar amount required to address the needs of persons with HIV/AIDS that are not homeless but need supportive housing or services. (This is required for HOPWA recipients.)

“Other”: Specify by entering the description, priority need level and estimated dollar amount.

Table 1C
Summary of Specific Homeless/Special Needs Objectives

Priority Need Category: Enter the priority need category that most nearly describes what you will do with the funds available for the following priority need categories: Homeless/HIV/AIDS, and Non-Homeless Special Needs.

Specific Objectives: The grantee should identify specific, measurable objectives for each priority need category. Each specific objective developed to address a priority need must be identified by number and contain proposed accomplishments, the time period (i.e. one, two, three or more years), and annual program year numeric goals the jurisdiction hopes to achieve during the program year, or in other measurable terms as identified by the jurisdiction.

Performance Measure: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished during the period of time designated for the strategy.

Expected Units: Enter the total number of the item you have indicated under Performance Measure that you expect will be accomplished during the time period of time designated for the objective.

Actual Units: Enter the total number of the item you have indicated under Performance Measure that you actually accomplished at the end of the period of time period designated for the objective. (This is for performance reporting purposes.)

Table 2A Priority Housing Needs

The priority housing needs assessment shall be based on data available from the U.S. Census, as updated by a properly conducted local study or any other reliable source that the jurisdiction must clearly identify, and should reflect the required consultation with social service and public housing agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons, and other persons served by such agencies, and the citizen participation process.

Definitions

Assisted Household - For the purpose of identification of priority needs, goals, and specific objectives, an assisted household is one that will receive benefits through the investment of Federal funds, either alone or in conjunction with the investment of other public or private funds. (The program funds providing the benefit(s) may be from any funding year or combined funding years.) A renter is benefited if the household or person takes occupancy of affordable housing that is newly acquired (standard housing), newly rehabilitated, or newly constructed, and/or receives rental assistance through new budget authority. An existing homeowner is benefited if the home's rehabilitation is completed. A homebuyer is benefited if a home is purchased during the year. Households that will benefit from more than one program (e.g. a renter who receives rental assistance while occupying newly rehabilitated housing) must be counted only once. To be included, the household's housing unit must, at a minimum, satisfy the HUD Section 8 Housing Quality Standards (see, e.g. 24 CFR 882.109).

Section 215 Affordable Housing

1. **Rental Housing:** A rental housing unit is considered to be an affordable housing unit if it is occupied by a extremely low-income, low-income, or moderate-income family or individual and bears a rent that is the lesser of (1) the Existing Section 8 Fair Market Rent for comparable units in the area or, (2) 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area, except that HUD may establish income ceilings higher or lower than 65 percent of the median income because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.
2. **Homeownership:**
 - (a) Housing that is for purchase (with or without rehabilitation) qualifies as affordable housing if it (1) is purchased by a extremely low-income, low-income, or moderate-income first-time homebuyer who will make the housing his or her principal residence; and (2) has a sale price that does not exceed the mortgage limit for the type of single family housing for the area under HUD's single family insuring authority under the National Housing Act.
 - (b) Housing that is to be rehabilitated, but is already owned by a family when assistance is provided, qualifies as affordable housing if the housing (1) is occupied by a extremely low-income, low-income, or moderate-income family which uses the house as its principal residence, and (2) has a value, after rehabilitation, that does not exceed the mortgage limit for the type of single family housing for the area, as described in (a) above.

Specific Instructions – Table 2A

Enter the letter H (for High), M (for Medium), L (for Low), to signify the relative priority to be given to each category of residents during the period of time designated in the strategic plan component of this document.

Small Related: A household of 2 to 4 persons that includes at least one person related to the householder by blood, marriage, or adoption.

Large Related: A household of 5 or more persons that includes at least one person related to the householder by blood, marriage, or adoption.

Elderly: A one or two person household in which the head of the household or spouse is at least 62 years of age.

Special Needs Populations: A household of one or more persons that includes persons that have mobility impairments or disabilities, (i.e., mental, physical, developmental, persons with HIV/AIDS and their families) or persons with alcohol or other drug addiction that may require housing with supportive services.

Other: A household of one or more persons that does not meet the definition of a small related,

large related, elderly, or special populations household. This category includes all households with only unrelated individuals present except those qualifying as elderly or special populations households. _

(MFI) Median Family Income:

0-30%: Subgroup with incomes of 0 to 30% of HUD-adjusted MFI for the area.

31-50%: Subgroup with income of 31 to 50% of HUD-adjusted MFI for the area.

51-80%: Subgroup with income of 51 to 80% of HUD-adjusted MFI for the area.

“Need Level” Column: Choose the relative priority of the housing need.

High Priority: Activities to address this unmet need will be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this document.

Medium Priority: If funds are available, activities to address this unmet need may be funded by the locality with federal funds, either alone or in conjunction with the investment of other public or private funds during the period of time designated in the strategy portion of this document. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The locality will not fund activities to address this unmet need during the period of time designated in the strategy portion of this document. The locality will consider certifications of consistency for other entities’ applications for Federal assistance.

Unmet Need: Enter the estimated number of eligible households in need of assistance for the ensuing five-year period that are not currently receiving assistance. This number is the unmet need.

Goal: For each of the categories of residents and tenure type indicated, enter the 3-5 year and annual housing goals identifying the number of households to be assisted with housing with funding from all sources during the period of time designated in the strategy portion of this document. Note, the goal of affordable housing is not met by beds in nursing homes.

Total Goals: Enter the total number of households to be assisted with housing during the period of time designated in the strategy portion of this document.

Total Section 215 Goals: Enter the total number of households to whom the jurisdiction will provide affordable housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

Total Section 215 Renter Goals: Enter the total number of renter households the jurisdiction

will provide affordable rental housing meeting the Section 215 criteria during the period designated in the strategy portion of this document using funds made available.

Total Section 215 Owner Goals: Enter the total number of owner households the jurisdiction will provide affordable homeownership housing meeting the Section 215 criteria during the period of time designated in the strategy portion of this document using funds made available.

Table 2B

Priority Community Development Needs

General Information

The needs listed in this section are non-housing community development needs. You should identify all priority unmet public facility, infrastructure, public service, anti-crime, youth, senior program, economic development, planning, and other non-housing community development needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with adjacent units of local government.

Priority Need Level: You are not required to indicate the level of the priority need. Should you choose to do so enter letter H (for High), M (for Medium), L (for Low) or N (for No Such Need) to signify the relative priority to be given to each item listed during the period of time designated in the strategy portion of this document.

High Priority: The jurisdiction plans to use funds made available for activities that address this unmet need during the period of time designated in the strategic plan.

Medium Priority: If funds are available, activities to address this unmet need may be funded by the locality during the period of time designated in the strategic plan. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The jurisdiction does not plan to use funds made available for activities to address this unmet need during the period of time designated in the strategic plan. The jurisdiction will consider certifications of consistency for other entities' applications for Federal assistance.

No Such Need: The jurisdiction finds there is no need or the jurisdiction shows that this need is already substantially addressed.

Unmet Priority Need: This is an optional field. Should you desire to use it, enter the estimated number of units of measure for each unmet priority non-housing community development need identified in the community for the ensuing five-year period designated in the strategic plan, regardless of whether adequate funds (public and private) are available to address the identified priority need. For public facilities and improvements indicate the number of projects needing assistance that the community considers a priority. For public services, indicate the estimated

number of people needing assistance that the community considers a priority. For economic development needs, indicate the number of businesses or projects that community considers a priority.

Dollars to Address Unmet Priority Need: Enter the estimated expenditure needed (in current dollars) to address the priority non-housing community development needs the jurisdiction either currently has or will have over the period of time designated in the strategic plan component of this document. Include all funds (public and private) that would be needed to address the priority needs.

Goals: This is an optional field. Should you desire to use it, enter the 3-5 year and annual non-housing community development goals the jurisdiction expects to achieve during the period of time designated in the strategic plan component of this document using funds made available. For public facilities and improvements, indicate the number of projects. For public services, indicate the number of people to be served. For economic development needs, indicate the number of projects or businesses to be assisted or the number of jobs that will be created/retained.

Table 2C **Summary of Specific Housing and Community Development Objectives**

Priority Need Category: Enter the priority need category that most nearly describes what you will do with the funds available for the following priority need categories: Rental Housing, Owner-Occupied Housing, Public Facilities, Infrastructure, Economic Development, Public Services, Planning/Administration, and Other.

Specific Objectives: The grantee should identify specific, measurable objectives for each priority need category. Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e. one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve during the program year, or in other measurable terms as identified by the jurisdiction. Note, the goal of affordable housing is not met by beds in nursing homes.

Performance Measure: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished during the period of time designated for the strategy.

Expected Units: Enter the total number of the item you have indicated under Performance Measure that you expect will be accomplished during the time period of time designated for the objective.

Actual Units: Enter the total number of the item you have indicated under Performance Measure that you actually accomplished at the end of the period of time period designated for the objective. (This is for performance reporting purposes.)

Table 3
Action Plan Projects Table

General Instructions:

This portion of the table is to be used to enter information on projects that will be carried out during the program year with grant funds made available for program year XXXX and, if applicable, funds made available from prior year funds.

Project Title: Enter the name of the project.

Priority Need Category: Enter the priority need category that most nearly describes what you will do with available funds. The grantees selects its identified need from a list of priority need categories. The priority need categories are: Homeless/HIV/AIDS, Non-homeless Special Needs, Rental Housing, Owner Occupied Housing, Public Facilities, Infrastructure, Economic Development, Public Services, Planning/Administration, and Other.

Objective Number: The grantee should identify the number of the specific objective identified in Table 1C or 2C.

Descriptions: Enter information is necessary to describe the proposed project pursuant to 24 CFR 91.220 (c), including the priority need that will be addressed and the number and type of families that will benefit from the proposed project. For CDBG activities, the description should include sufficient detail, including location, to permit a clear understanding of the nature and eligibility of the activity and to allow citizens to determine the degree to which they may be affected. For example, housing activities should the number and type families that will benefit from the proposed project and whether the assistance is for owner-occupied, rental, or publicly owned units.

Project ID: The value of this variable uniquely identifies each and every project you enter.

Local ID: This is an optional alpha-numeric field. You may use it to enter a project code of up to 18 characters that has some local significance. No two projects may share the exact same code.

HUD Matrix Code: Enter the code that most nearly describes what you will do with the funds. Only one matrix code may be used for a project.

Funding: This section describes the amount of Federal and non-Federal resources that will be used to address needs identified in the plan.

Community Development (CDBG): Enter the amount of CDBG funds that will be used for projects that will take place during the program year. Include any program income and Sec. 108 loan funds in the amount.

Homeless (ESG): Enter the amount of Emergency Shelter Grant funds that will be used for projects that will take place during the program year.

Housing (HOME): Enter the amount of HOME funds that will be used for projects that will take place during the program year.

HIV/AIDS (HOPWA): Enter the amount of Housing Opportunities for Persons with AIDS program funds will be used for projects that will take place during the program year within the eligible metropolitan statistical area.

Total CPD Formula Funds: This is the total amount of CPD formula funds that will be used to address needs identified in the plan.

Prior Year Formula Funds: Identify amount of prior year CPD formula funds that will be used during the program year to address needs identified in the plan.

Assisted Housing: Identify the amount of Assisted Housing program funds that will be used during the program year to address needs identified in the plan.

PHA (Public Housing Agency): Identify the amount of public housing agency program funds that will be used during the program year to address needs identified in the plan.

Other Funding: Identify amount of funding from other HUD or non-HUD sources that will be used during the program year to address needs identified in the plan.

Total: This is the total amount of funds that will be used to address needs identified in the plan.

Project Details:

CDBG Citation: Enter the CDBG regulatory citation based upon the matrix code that you selected.

CDBG National Objective: Use this field only if you enter an amount greater than zero for CDBG \$. You should indicate the National Objective for the CDBG program that this project will meet.

Type of Recipient: Indicate the type of recipient that will be administering the project.

Performance Indicator: Enter the performance indicator that most closely describes the type of accomplishment and the most appropriate measure of that accomplishment. The performance should be a reasonable projection of what will be accomplished within the program year.

Annual Units: Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished during the program year.

Units Upon Completion: Enter the total number of the item you have indicated under Performance Indicator that you expect will be accomplished after all funds have been spent.

Starting Date: Enter the projected starting date for the project.

End Date: Enter the projected completion date for the project.

Project's Primary Purpose: Indicate whether the project's primary purpose to help the homeless; help persons with HIV/AIDS; help persons with disabilities; address needs of public housing.

Type of Location: There are five possible formats for this section (Address, Community Wide, CT & BG, N/A, Suppressed). This information indicates where a project will occur.

Table 4 **Priority Public Housing Needs**

General Information

This section contains an optional table for describing priority needs of public housing. You should identify all priority public housing restoration and revitalization needs that your community either currently has or will have over the period of time designated in the strategic plan component of this document. This should reflect the results of the citizen participation process and the required consultation with public housing agencies that are located in your jurisdiction.

Priority Need Level: You are not required to indicate the level of the priority need. Should you choose to do so enter letter H (for High), M (for Medium), L (for Low) or N (for No Such Need) to signify the relative priority to be given to each item listed during the period of time designated in the strategy portion of this document.

High Priority: The public housing agency or the jurisdiction plan to address this need with Federal funds, either alone or in conjunction with the investment of other public or private funds during the period designated in the strategy portion of this document.

Medium Priority: If funds are available, the public housing agency or jurisdiction may address this need with Federal funds, either alone or in conjunction with the investment of other public or private sector funds during the period of time designated in the strategy portion of this document. Also, the locality will take other actions to help this group locate other sources of funds.

Low Priority: The public housing agency or jurisdiction do not plan to use Federal funds, either alone or in conjunction with the investment of other public or private resources for activities that address this need during the period of time designated in the

strategy portion of this document. The jurisdiction will consider certifications of consistency for other entities' applications for Federal assistance.

No Such Need: The public housing agency or jurisdiction finds this is not a priority need or this need is already substantially addressed.

Estimated Dollars to Address: Enter the estimated expenditure needed (in current dollars) to address the priority public housing needs the locality either currently has or will have over the period of time designated in the strategic plan component of this document. Include all funds (Federal and non-Federal) that would be needed to address the priority needs.

Attachment Neighborhood Revitalization Strategy Areas

A jurisdiction that elects to develop a neighborhood revitalization strategy that includes the economic empowerment of low- and moderate-income persons may, upon HUD approval of the strategy, obtain greater flexibility in the use of CDBG funds in the revitalization area(s). These incentives are as follows:

- (1) **Job Creation/Retention as Low/Mod Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take, or are considered for, such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i));
- (2) **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy may be considered to be part of a single structure for purposes of applying the low- and moderate-income national objective criteria, thus providing greater flexibility to carry out housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii));
- (3) **Aggregate Public Benefit Standard Exemption:** Economic development activities carried out under the strategy may, at the grantee's option, be exempt from the aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing its record-keeping requirements (24 CFR 570.209(b)(2)(v)(L) and (M)); and,
- (4) **Public Service Cap Exemption:** Public services carried out pursuant to the strategy by a Community-Based Development Organization will be exempt from the public service cap (24 CFR 570.204(b)(2)(ii)).

In developing a neighborhood revitalization strategy, localities should consider that HUD will approve the strategy for this purpose only if it meets the following criteria:

- (1) **Boundaries:** The grantee has identified the neighborhood's boundaries for which the strategy applies. All areas within those boundaries must be contiguous.
- (2) **Demographic Criteria:** The designated area must be primarily residential and

contain a percentage of low- and moderate-income residents that is equal to the "upper quartile percentage" (as computed by HUD pursuant to 24 CFR 570.208(a)(1)(ii)) or 70 percent, whichever is less, but not less than 51 percent)

- (3) **Consultation:** The strategy must be developed in consultation with the area's stakeholders, including residents, owners/operators of businesses and financial institutions, non-profit organizations, and community groups that are in or serve the neighborhood;
- (4) **Assessment:** The strategy must include an assessment of the economic situation in the area and an examination of economic development improvement opportunities and the problems likely to be encountered;
- (5) **Economic Empowerment:** There must be a realistic development strategy and implementation plan to promote the area's economic progress focusing on activities to create meaningful jobs for the unemployed and low- and moderate-income residents of the area (including jobs created by HUD-assisted efforts) as well as activities to promote the substantial revitalization of the neighborhood; and
- (6) **Performance Measurement:** The strategy must identify the results (e.g. physical improvements, social initiatives and economic empowerment) expected to be achieved, expressing them in terms that are readily measurable. This will be in the form of "benchmarks."

Since the grantee's HUD CPD Field Office representative will review the neighborhood strategy submission, the grantee should consult with its HUD representative to discuss what existing documents and information the grantee will be relying on for its submission and what information HUD will need to make this approval. Approval of the jurisdiction's Consolidated Plan does not imply approval of a neighborhood revitalization strategy proposal. HUD approval of any such strategy will be issued separately.